

Via Certified Mail

OFFICE OF
GENERAL COUNSEL

Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

2018 MAR 27 AM 11:40

MUR # 7353

March 21, 2018

Re: Complaint Against Danny Tarkanian, Tarkanian for US Senate (FEC#C00654095), Victoria Seaman, and Victoria Seaman For Congress (FEC#C00652354)

Dear Counsel,

Pursuant to the Federal Election Campaign Act ("FECA"), as well as Federal Election Commission ("FEC" or "Commission") regulations, I, Jericha Deaux, Las Vegas, NV 89108, file this complaint ("Complaint") against Danny Tarkanian, Tarkanian For US Senate (FEC#C00654095), Victoria Seaman, and Victoria Seaman for Congress (FEC#C00652354).

Danny Tarkanian is a candidate for Nevada's Congressional District 3. Tarkanian For US Senate is the principal campaign committee for Danny Tarkanian's 2018 campaign. Victoria Seaman is a candidate for Congressional District 3 in Nevada. Victoria Seaman For Congress is the principal campaign committee for Victoria Seaman's 2018 campaign.

Facts and Analysis

1. On March 20, 2018, Amy Tarkanian, wife of Danny Tarkanian, commented on a Facebook post with the statement "Do you actually think that after we gave Victoria all of our personal info we had saved for cd3, donor information to help her fundraise and invite her to all of Dannys fundraisers as well as that THIS was our intention all along?" Facebook post is located at:
<https://www.facebook.com/RichSCarreon/posts/10155529773053412>. Exhibit A.
2. This Facebook comment was in response to an attack by Mike Colian, a Victoria Seaman volunteer. Facebook post is located at: <https://www.facebook.com/RichSCarreon/posts/10155529773053412>. Exhibit B.
3. Danny Tarkanian previously campaigned in both the 2016 primary and general election for Nevada's Congressional District 3. FEC Form 2 at:
<http://docquery.fec.gov/pdf/784/201607209021669784/201607209021669784.pdf>.
3. Danny Tarkanian has repeatedly campaigned for federal office and should be aware of the disclosure requirements under federal law and regulation. FEC filings at:
<https://www.fec.gov/data/search/?search=tarkanian>.

4. Victoria Seaman has been photographed at numerous campaign fundraising events with Danny Tarkanian and Amy Tarkanian. Exhibit C.

5. A review of public FEC filings for Tarkanian for US Senate in the current election cycle do not disclose any in-kind contributions, contributions, or transfers to Victoria Seaman for Congress.

<http://docquery.fec.gov/pdf/471/201802070200131471/201802070200131471.pdf>

6. A review of public FEC filings for Victoria Seaman for Congress in the current election cycle do not disclose any in-kind disbursements, disbursements, or transfers to Tarkanian for US Senate.

<http://docquery.fec.gov/pdf/027/201801319091039027/201801319091039027.pdf>

7. Personal data on a federal campaign for a congressional district can contain data on hundreds of thousands of individual voters. The value of this data is significant and typically a closely held campaign asset.

8. Candidate fundraising organizations typically receive a percentage of the contributions raised as a commission. Assuming that fundraising information and introductions typically incur a 10-20% commission, the commercial value of this information is significant.

Summary of the Law

9. Federal law and Commission regulations require goods or services offered to a campaign committee for free or at less than the usual charge to be considered an in-kind contribution. 11 CFR 100.52(d)(1) and 100.111(e)(1).

10. Federal law and Commission regulations require the value of an in-kind contribution—the usual and normal charge—to count against the contribution limit as a gift of money does. 11 CFR 100.52(a), (d)(1) and 100.111(a), (e)(1).

11. Federal law and Commission regulations require a candidate or his campaign committee to disclose in-kind contributions, contributions and transfers from other federal candidates or campaign committees. 11 CFR 100.12, 104.3(a)(4) and 104.8(a).

12. Federal law and Commission regulations require a candidate or his campaign committee to disclose in-kind disbursements, disbursements and transfers to other federal candidates or campaign committees. Disbursements must be itemized regardless of amount for contributions to other federal candidates. 11 CFR 104.3(b)(4)(ii), (iii), (v) and (vi).

13. Federal law and Commission regulations limit a federal candidate's authorized committee(s) to no more than \$2,000 per election to another federal candidate's authorized committee(s). 52 USC §30102(e)(3)(B) and 11 CFR 102.12(c)(2).

Conclusion

Based on the above information, there is reason to believe that Danny Tarkanian, Victoria Seaman and their respective campaign committees have engaged in transactions that have not been disclosed as required by Federal law and Commission regulations.

Given that the assets in the transaction may have included a significant portion of data from a congressional race, it may be the case that the usual and normal value of an in-kind contribution also exceeded legal contribution limits.

Accordingly, I respectfully request that the Commission conduct an immediate investigation into this matter, and determine and impose appropriate sanctions on Danny Tarkanian, Tarkanian for US Senate, Victoria Seaman, and Victoria Seaman for Congress if they have violated Federal election law.

Respectfully submitted,

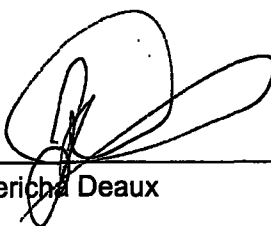


Jericha Deaux

Verification

The complainant listed below hereby verify that the statements made in the attached Complaint are, upon their information and belief, true. Sworn pursuant to 18 USC §1001.

For Complainant

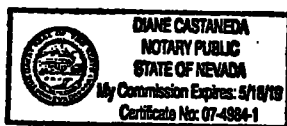



Jericha Deaux

State of Nevada
County of Clark

Signed and sworn to (or affirmed) before me on March 23, 2018 by Jericha Deaux

(Notary Stamp)





(Signature of notarial officer)

Exhibit A



Amy Tarkanian You can defend and support her by also not personally attacking another by spreading misinformation and lies. You can also be angry but resorting to immature name calling isn't becoming. Do you actually think that after we gave Victoria all of our personal info we had saved for cd3, donor information to help her fundraise and invite her to all of Dannys fundraisers as well that THIS was our intention all along?! Give me a break...you weren't a part of the contentious phone calls back and forth between us, the WH and staff. Danny went through the laundry list of reasons why he should still run for senate and in the end the President still asked Danny moved to over to CD3. Done, end of story.

Like · Reply · 2h



Source: <https://www.facebook.com/RichSCarreon/posts/10155529773053412>

Exhibit B



Mike Colian I would refuse it also. This shows desperation on the part of Tarkanian. He wants to win and will sell himself to the devil to get it done.

Like · Reply · 6h



Amy Tarkanian This thread is interesting since 1..I haven't been called personally by any of you to ask what exactly happened instead of making judgment calls 2.. Mike you already apologized once but continue to attack

Like · Reply · 5h



→ Woodrow Johnston replied · 1.5 Replies · 51 mins



Mike Colian I'm defending and supporting VICTORIA . Was unfair how this happened, what does friendship mean.

Like · Reply · 4h

→ William Fox replied · 1 Reply



Amy Tarkanian You can defend and support her by also not personally attacking another by spreading misinformation and lies. You can also be angry but resorting to immature name calling isn't becoming. Do you actually think that after we gave Victoria all of our personal info we had saved for cd3, donor information to help her fundraise and invite her to all of Dannys fundraisers as well that THIS was our intention all along?! Give me a break...you weren't a part of the contentious phone calls back and forth between us, the WH and staff. Danny went through the laundry list of reasons why he should still run for senate and in the end the President still asked Danny moved to over to CD3. Done, end of story.

Like · Reply · 4h



Source: <https://www.facebook.com/RichSCarreon/posts/10155529773053412>

10044444001

Exhibit C



Photo from Tarkanian Fundraiser with Dr. Gorka, December 19, 2017



Victoria Seaman for Congressional...
@VictoriaDseaman

Following

On the campaign trail! Happy to spend time with the Armenian community, proud to have been one of the sponsors for a proclamation in 2015 to recognize the Armenian Genocide. Thanks @DannyTarkanian & @MrsT106 for inviting me to participate with this amazing group! #NV03



10:15 PM - 25 Jan 2018

Source: <https://twitter.com/VictoriaDseaman/status/956772599115087872>